

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-CV-30135-KPN

STACEY QUINONES,	)
Plaintiff	)
	)
vs.	)
	)
TOWN OF HOLLAND, HOLLAND POLICE	)
DEPARTMENT, CHIEF KEVIN GLEASON,	)
RAY MOREHOUSE AND EARL JOHNSON,	)
Defendants	)

**JOINT EMERGENCY MOTION TO EXTEND**  
**THE TIME TO COMPLETE DISCOVERY**

NOW COME the parties in the above-captioned matter and hereby respectfully move this Court to allow them an additional ten days in which to complete discovery. As reasons for this motion, the parties state that the deposition of the defendant, Chief Kevin Gleason, was scheduled for October 4, 2006 at 10:00 a.m. At about 9:55 a.m. on October 4<sup>th</sup>, defendants' counsel received a call from the Clerk of the Hampshire Superior Court informing her that she would begin trial in Stephen J. Hyde, Sr. v. Town of Southamptn, et al, Docket Number: 04-157, the following day. Due to the need to focus on trial preparation, the deposition of Chief Gleason was postponed, with assent of plaintiff's counsel. Further, plaintiff's counsel was called to trial, beginning the week of October 10, 2006, at the Hampden Superior Court in Western Mass Electric Co. v. Russo Brothers, Docket Number 03-1151.

The current deadline for completing non-expert depositions is October 31, 2006. Due to the parties' schedules, the deposition of Chief Gleason was not able to be rescheduled prior to the

October 31<sup>st</sup> deadline. Therefore, counsel for the parties have re-scheduled Chief Gleason's deposition for November 9 and November 10, 2006.

A Case Management Conference is scheduled for November 15, 2006 and this extension should not affect the conference going forward on that date.

THE PLAINTIFF  
STACEY QUINONES

By /s/ Lisa Brodeur-McGan  
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THE DEFENDANTS  
TOWN OF HOLLAND, HOLLAND  
POLICE DEPARTMENT, CHIEF KEVIN  
GLEASON, RAY MOREHOUSE AND  
EARL JOHNSON

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 10<sup>th</sup> day of October, 2006.

/s/ Patricia M. Rapinchuk